



Green Diamond EIS HCP, FW8 <fw8greendiamondeishcp@fws.gov>

[EXTERNAL] FHCP comments

1 message

Doug Smith <humboldtarearestorationteams@gmail.com>
 To: FW8GreenDiamondEISHCP@fws.gov

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start this comment process over you have failed.

Comments on FWS-Green Diamond FHCP and Not Extending The AHCP/AACC on more year.

By Doug Smith H.A.R.T. Director/founder This experience has made me sick to my stomach.

Congratulations your 5 point policy to create public participation has lead to only myself and my girlfriend attending your public shill meeting. Some GDH employees appeared but no serious discussion or dialog of maps of the actual DCA or previous set asides or non-set asides and how these are associated by sharing the same boundries and habitat values. All maps at the presentation and the FHCP Atlas is at a scale that leaves me to believe GDH or the FWS is not serious about presenting real data to the public, or scribbled a few circles on a map. This so called hearing was not in the Northcoast Journal calander under meetings or lost coast outpost or other social media. This meeting was only noticed in one of three weekly publications and no dialoge on radio or television that I know of as GDH prefers. If a hand full of people make comments you have achieved nothing and have not done your job. Id say its a do over publication. The poor quality of information in the EIS and FHCP (data or maps) even in the apendix's where I don't want a copy for future reference. This scanned imagery of words on paper is not worth a half million dollars. You should give your money back to tax payers.

Was there even a meeting or hearing on the AHCP/AACC. Is this AHCP open for public comment since it is being extended for 12 years and part of the FHCP. 85% canopy retention in RMZ is allowing GDH to reduce canopy by 30% and basil area limiting recrutment of lwd inside impaired riparian areas and delaying the rising of age class. GD must not be allowed to reduce riparian tree age groups and only restore them at the end of the plan timeframe. It should be front loaded to allow all trees in the RMZ and unstable areas to get as large as possible (no harvest) becouse all habitat requirements for affected species are placed there. This harvesting in RMZs is not what recovery of listed species looks like. one conifer retained will not achieve goals of the FHCP, like one or two hardwoods wont feed flying squirrels and wood rats. Let them eat bark like the starving bears subsisting in wind sweeped freezing or soil cooking clearcuts. I was in a GDH clearcut and the leave trees were on the outer edge of the harvest boundry not well dispersed thought the cut and many firs had win thrown in the first year. why is their no words describeing the snow and ice storms that pin the tops of hardwood trees to the ground. I rember laffing out loud when I read simpson has no rain on snow events in the AHCP. Did that lie of wording ever get changed. Planting redwood or fir in tan oak and white oak dominate areas where soil types and loss of micro climates dictate if an white oak the size of my wrist must die to be replaced by a dieing redwood sapling. A fools Gambit it is but I will be monitoring this site.

The company known as Green Diamond Resource Company is a byproduct of SIMPSON restructuring a family owned business into a corporate debt

holding company and the note holders are not responsible enough to put their name on this FHCP. I will refer to the entity Green Diamond as GDH for Green Diamond Holding Company until I am proven wrong or shown deeds as to who owns any of the plan area. Stolen land fair and square and the trees and species that depend on them have to pay the cost or suffer the burden for how much longer.

Why verify samples of only 20% of take sites and not all of them? All take sites must be sampled for occupancy or reoccupancy or returns of NSO did not continue to use return sites and takes really did occur to fault or unvalidate the old HCP toward jeopardy. Did jeopardy of the HCP occur on GDH lands? "1,998 fledgling NSO success means more reproductive pairs but not sure why baby owls don't make it or do they only replace dead parents. Answer is not the Daily Double HA HA Who logged that habitat? GDH for a million. Prey and foraging habitat must have been very limited before loggers started their third rotation harvest. If "NSO habitat increased 38%" as stated on p 75 explain species decline. NSO numbers will continue to decline even with fancy model verification and habitat improvements, Why? Harvest levels to much area too fast GDH will have close 75% of the landscape plan area to play logger on. Would cutting the volume, area and rate of harvest in half or two thirds have a beneficial effect on plan species. Where have all the fledglings gone, long time passing. When will we ever learn! as it says in that song.

As of 2017 a take permit of fudged numbers because Northern Spotted Owls NSO returned to areas presumably to nest after harvest activity disturbance caused take 75 times but 55 actual allowed take occurred just under the 58 takes allowed as extended to GDH. I call this fudged (FU@^&ED) math that 20 to 40 NSO returned to denatured habitat. Are they still returned or are they part of the 2.4 per year takes allowed till 2020. NO data on where or when NSO returns occurred is presented and are they added to the NDDB as take returns. where is all the data on fledgling survival and new nests? oh that is the continuation of population decline, I mean to say NSO DEATH killed by loggers past and ongoing actions and barred owls who moved into the dead zones created by unthrottled cumulative area of harvest activity. The killing continues thanks to FWS willingness to do as told. If take counts stop will the take continue. All the modeling for the world could not put this humpty back together or allow NSO to be delisted. Is the 5 year review period gone? Why is this FHCP not terminated at twenty years and renegotiated then. No discussion on why ending clearcutting or even age management is or is not working for recovery of any species on GD property holdings. Where set asides chosen as failures since inception of NSO listing to prove set asides do not work. GDH you got your wish or can alt b and the preferred alt. all be chosen and continued toward recovery. More larger set asides not less in protected RMZ is better for all species.

Fischers the left behind species will have its home logged " until den is abandoned or kits have been moved over .25 miles." This is not justified in the literature or in the FHCP. Who thought that .25 miles is ok to limit take what of one mile or a half mile is more reasonable since they scatter in human presence remembering the hunters and trappers. In section 5.3 "if decline some adaptive management actions" will occur. One death of a fischer is a decline and GDH killed one or more in and open water tank. How many in a trend will have to be taken for a decline to exist? Decline needs definition and so do the adaptive management actions, ie the logging, road building and use will change how? This FHCP is lacking in a discussion of how many road miles and densities around fisher detections will be allowed and when removal will occur. How many miles of roads are too many or the density of roads will allow for recovery to occur (clue look up

slausen or zelinsky.).

You continue to allow roads to "fragment and provide corridors for predators bobcat and cyote" to create deadly mischief. Let the shooting of cyotes begin, eh! Where is the discussion of road removal and GDH habitat cores for this species to connect link habitat buffers to other protected cores. The FHCP is not a conservation planing document to keep fisher and martins from being listed or is it to keep them listed as job security. oh precluded so you cant do your job of protecting species before decline occurs more than it already has. The lack of declanation is your legacy. On p 55 (Buck 94, Truex 98) FWS admits that "timber harvest reduce fischer density and survival. Fischers need no cut buffers of their home range. Determin, what is the site specific home range for GDH plan area and this FHCP for the fisher and martin in the plan area.

Martins warrent listing in the plan area because they were "extrapated from 99% of their range and 38% of occupied land is elgable for harvest by GDH."

Voles can and must be studied with infrared cameras before harvest especialy in RMZ's.

Where are the proctions for marbled mureletts in the plan area.

FWS, GDH, and everyone know that reducing the area, rate and volume of harvest is the only thing that will save the NSO and other covered species. Reduce the harvest to create recovery, please.



GD holding FHCP comments.rtf

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